

IFRS® SUSTAINABILITY DISCLOSURE STANDARDS (ISSB STANDARDS)— APPLICATION AROUND THE WORLD



JURISDICTIONAL PROFILE: Kenya

Disclaimer—The information in this profile is for general guidance only and may change from time to time. You should not act on the information in this profile, and you should obtain specific professional advice to help you in making any decisions or in taking any action in relation to this profile. If you believe that the information is incorrect, please contact us at <u>regulatoryaffairs@ifrs.org</u>.

This profile provides information about the application of ISSB Standards in Kenya. The ISSB Standards are developed and issued in the public interest by the International Sustainability Standards Board (ISSB). The ISSB is a standard-setting body of the IFRS Foundation (Foundation), an independent, not-for-profit organisation.

The Foundation has prepared this profile applying an analysis that is in accordance with the <u>Inaugural Jurisdictional Guide for the adoption or other use</u> <u>of ISSB Standards</u> (Jurisdictional Guide) and based on information provided by jurisdictional authorities in response to a questionnaire the Foundation issued on the regulatory approach to the use of the ISSB Standards. The Foundation invited the questionnaire's respondent and international accounting firms to review a draft of the profile.

The purpose of the Foundation's jurisdictional profiles is only to illustrate the extent of adoption or other use of the Standards across the globe. The profiles do not reflect the intellectual property licensing status of the Standards within any given jurisdiction. The Standards are protected by copyright and are subject to licensing arrangements agreed upon within their jurisdiction. For further information, please contact <u>licensing@ifrs.org</u>.

Description of the jurisdictional approach

Jurisdictional approach towards the adoption or other use of ISSB Standards¹ Updated 12 June 2025

Current²

Jurisdictional approach

Permitting the use of ISSB Standards

Target³

Fully adopting ISSB Standards

Target is based on decisions announced in the Institute of Certified Public Accountants of Kenya's Roadmap for Adoption of IFRS Sustainability Disclosure Standards.

¹ Refers to the range of approaches that jurisdictions may take to 'adopt, apply or otherwise be informed by' ISSB Standards when introducing sustainability-related disclosure requirements in their legal and regulatory frameworks, as set out in Section 3.4 of the *Jurisdictional Guide*. This range includes approaches that involve the adoption or other use of IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures* directly, as well as the introduction of local sustainability-related disclosure requirements (or standards) designed to deliver functionally aligned outcomes to those resulting from the application of IFRS S1 and IFRS S2 (referred to as 'requirements with functionally aligned outcomes').

² The current approach describes the most up-to-date status of a jurisdiction's sustainability-related disclosure requirements reflecting what entities in the jurisdiction are required or permitted to apply at the time the jurisdictional profile is published.

³ The target approach describes the stated jurisdictional target that a jurisdiction aims to achieve for sustainability-related disclosure requirements reflecting either the final milestone in the jurisdictional roadmap or requirements that have already been introduced by law or regulation but where application by entities will only be required at a future date.



Regulatory approach to sustainability-related disclosures

Has the relevant authority(ies) in the jurisdiction published a decision to require sustainability-related financial disclosures?	Yes.
Does the jurisdiction's regulatory framework for sustainability-related disclosures adopt or otherwise use ISSB Standards?	Yes.
Description of and links to the relevant announcement, roadmap, standards and/or law or regulation.	The national standard setter, the Institute of Certified Public Accountants of Kenya, issued a November 2024 <u>Roadmap for Adoption of IFRS</u> <u>Sustainability Disclosure Standards in Kenya</u> for the adoption of IFRS S1 and IFRS S2. The requirement applies to all entities considered public interest entities (including all listed entities), as well as to some non-listed entities.
Summary of the timeline for the application of the jurisdiction's sustainability-related disclosure requirements by entities in the jurisdiction.	<i>All entities</i> are permitted to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2024. <i>Public interest entities</i> (described in the <i>Reporting entities</i> section below) are mandated to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2027. <i>Non-public interest entities (large entities)</i> are mandated to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2027. <i>Non-public interest entities (large entities)</i> are mandated to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2027. <i>Non-public interest entities (large entities)</i> are mandated to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2028. <i>Small- to medium-sized entities</i> are mandated to apply the ISSB Standards for annual financial reporting periods commencing on or after 1 January 2028.

Extent of application of ISSB Standards

Requirements

Applicable ISSB Standards: which ISSB Standards does the legal or regulatory framework adopt or otherwise use? IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures.



Scope: what information is an entity in the jurisdiction required to disclose?	Material information about the sustainability-related risks and opportunities that could reasonably be expected to affect its cash flows, its access to finance or the cost of capital over the short, medium or long term.
Focus: at whom is the information provided by sustainability-related disclosure requirements in the jurisdiction focused?	Existing and potential investors, lenders and other creditors.
Placement of disclosures: does the jurisdiction require that an entity include sustainability-related financial disclosures as part of general purpose financial reports?	Yes.
Timing of reporting: does the jurisdiction require that an entity report sustainability-related financial disclosures at the same time as its related financial statements?	Yes. Sustainability-related financial disclosures are required to be published at the same time as the related financial statements, as required by IFRS S1 (subject to transition relief for the first annual reporting period, consistent with paragraph E4 of IFRS S1).
Transition reliefs: do the jurisdiction's requirements include any extensions of the transition reliefs included in IFRS S1 and IFRS S2?	No.
Jurisdictional modifications: do the jurisdiction's requirements include any modifications to the requirements in IFRS S1 and IFRS S2?	No.
Schedule of differences between ISSB Standards and jurisdictional requirements, if applicable and available.	Not applicable.



Dual reporting: is 'dual reporting' allowed, such that entities in the jurisdiction may assert compliance both with IFRS Sustainability Disclosure Standards as issued by the ISSB and another set of standards (for example, compliance with both ISSB Standards and the jurisdiction's sustainability-related disclosure requirements)?

No.

Assertion of compliance: does the jurisdiction's legal or regulatory framework require entities to make an explicit and unreserved statement of compliance?

Yes—with IFRS Sustainability Disclosure Standards as issued by the ISSB.

Reporting entities

Are all or most⁴ **domestic** publicly accountable entities either required or permitted to comply with the jurisdiction's sustainability-related disclosure requirements?

	Current	Target
or	Yes—permitted.	Yes—required.
	Permitted for all.	 Required for entities considered to be 'public interest entities', which includes those in any of the following categories: a) a publicly traded entity; b) an entity one of whose main functions is to take deposits from the public; c) an entity one of whose main functions is to provide insurance to the public; or d) an entity specified as such by law, regulation or professional standards reflecting significant public interest in the financial condition of such an entity due to the potential impact of their financial well-being on stakeholders.

⁴ In accordance with the *Jurisdictional Guide*, 'most' publicly accountable entities is intended to capture the weight of the entities in relation to the economy or activity in the jurisdiction, instead of the number of entities subject to the requirements. It is based on the relative weight of listed entities captured by the requirements in relation to the jurisdiction's gross domestic product or the overall market capitalisation in the main equity index.



Are entities without public accountability either required or permitted to comply with the jurisdiction's sustainability-related disclosure requirements?	Required for non-public interest entities (large entities) for annual financial reporting periods commencing on or after 1 January 2028 and all small- to medium-sized entities for annual financial reporting periods commencing on or after 1 January 2029.
What sustainability-related disclosure requirements apply to foreign publicly accountable entities?	Foreign publicly accountable entities are required to report in accordance with the same framework as domestic publicly accountable entities.
Reporting entity: do the jurisdiction's requirements specify that an entity's sustainability-related financial disclosures shall be for the same reporting entity as the related financial statements?	Yes.

Other sustainability reporting considerations

Additional disclosure requirements: does the jurisdiction require or permit an entity to provide additional disclosures within the report that contains sustainability- related financial disclosures based on ISSB Standards?	Yes.
If additional disclosures are permitted or required, what is the basis for such additional information?	Listed entities are permitted to apply GRI Standards for sustainability- related risks and opportunities not addressed by the ISSB Standards but are required to ensure that information required by ISSB Standards is not obscured.
Does the jurisdiction require that any such additional disclosures are clearly identified and do not obscure information required by ISSB Standards?	Yes.



Digital reporting: is digital reporting of sustainability-related disclosures required?	No.
If yes, what digital reporting taxonomy is used (if applicable)?	Not applicable.
Assurance: what level of assurance over sustainability-related disclosures does the jurisdiction require?	Section 9.3 of the <i>Roadmap for Adoption of IFRS Sustainability Disclosure</i> <u>Standards in Kenya</u> provides an 'assurance roadmap', setting out a phased approach that begins with voluntary limited assurance and concludes with mandatory reasonable assurance. The following includes key steps related to public interest entities (refer to the roadmap document for implementation dates for other entities).
	Fiscal years beginning on or after:
	1 Jan 2025: voluntary limited assurance
	1 Jan 2028: mandatory limited assurance
	1 Jan 2029 : mandatory reasonable assurance, except that limited assurance will apply to disclosures about Scope 3 greenhouse gas emissions
	1 Jan 2030 : mandatory reasonable assurance for all disclosures
Other comments regarding the content of sustainability-related financial reporting or the use of ISSB Standards in the jurisdiction.	None.

Jurisdictional authorities

Organisation(s):	Capital Markets Authority
	Central Bank of Kenya
	Institute of Certified Public Accountants of Kenya
	Nairobi Securities Exchange PLC



Role of the organisation(s):	Capital Markets Authority (CMA): has primary responsibility for supervising, licensing and monitoring the activities of market intermediaries, including the Stock Exchange and the Central Depository and Settlement Corporation. The CMA issues regulations for capital market entities to exercise this mandate.
	Central Bank of Kenya: provides legal and regulatory framework and issues prudential guidelines to govern the operations of financial institutions under its mandate. It also licenses and undertakes surveillance of financial institutions to ensure compliance with laws and regulations.
	Institute of Certified Public Accountants of Kenya (ICPAK): is the local professional accountancy organisation and standard-setting body. Established by the Accountants Act, 2008, the Institute has a legislative mandate to issue financial reporting standards in Kenya.
	Nairobi Securities Exchange PLC: provides a platform for the listing and transfer of equities of listed entities. The exchange issues listing rules to require entities to produce financial statements in accordance with prescribed reporting framework as issued by ICPAK from time to time.
Website:	https://www.icpak.com/